

Before the Federal Communications Commission  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

In the Matter of

Truth -in-Billing  
And  
Billing Format

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CC Docket No. 98-170

**RECEIVED**

JUL 26 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Petition for Stay or Waiver and Partial Clarification**

**Sprint Corporation  
Jay C. Keithley  
Rikke K. Davis  
Norina Moy  
Its Attorneys**

**1850 M Street, NW, Suite 1110  
Washington, DC 20036**

**July 26, 1999**

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List A B C D E

## **Summary**

Sprint Corporation, on behalf of its local and long distance operating entities, respectfully requests that the Commission stay the effectiveness of its Truth in Billing Order to the extent that it demands carrier compliance by September 6, 1999. In the alternative, Sprint requests a waiver of this requirement. Sprint further requests clarification of the requirement that carriers highlight "new service providers" other than new primary interexchange carriers and of its requirement that carriers highlight non-deniable charges.

The stay should be granted for the following reasons:

1. Sprint would likely prevail on the merits because the Order imposes an unreasonable and arbitrary compliance deadline established without apparent consideration of the complexities, time, and Y2K implications associated with meeting the Order's requirements - a deadline that neither Sprint nor many other carriers subject to the Order can reasonably meet.
2. If allowed to remain effective, the Order would cause Sprint serious and irreparable harm in that Sprint would be unable to comply with the deadline and would potentially be subject to fines for such noncompliance. Further, in an effort to hasten compliance, Sprint would be forced to consider redeploying the billing project staff currently allocated to other projects, including Y2K, thereby causing interference and potentially delaying roll-out of other new products and resulting in lost revenue opportunities.

3. Others will not be harmed by the grant of stay. Granting a stay of the Order's effective date would not harm Sprint's competitors or customers; in fact, it will benefit both. Many other carriers have expressed the need for additional time to accommodate the Order's billing requirements and customers will benefit from a bill that is carefully evaluated and tested prior to implementation rather than hastily deployed to meet an arbitrary deadline.
4. The stay will serve the public interest in that it would allow enough time for Sprint to fully develop and test its new bill prior to introduction to the public, thereby facilitating a one-time change that provides customers with complete and accurate descriptions of the new bill and accommodates the clarity and consumer-oriented billing that the FCC intends.

If, for some reason, the Commission chooses not to grant a stay, Sprint requests a waiver of the September 6, 1999 deadline. A waiver is justified because, despite its best good faith efforts, Sprint will be unable to meet that deadline and a waiver will be in the public interest.

Sprint also requests clarification of two rules: Rule 64.2001(a)(2)(ii), requiring carriers to highlight "new" service providers, and Rule 64.2001(c), requiring carriers to highlight non-deniable charges. The Commission should make clear that only new primary service providers need to be identified as "new" based on month-to-month changes as this requirement would otherwise be unjustifiably costly to implement—in terms of money, effort, and delay—in relation to its likely value (if any) to customers. The

Commission should also clarify which carrier –IXC or LEC– is responsible under Section 64.2001(c) for highlighting non-deniable charges and how standard reporting formats are to be developed.

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**Petition for Stay or Waiver  
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Sprint Corporation ("Sprint"), on behalf of its local and long distance operating entities, hereby respectfully requests that the Federal Communications Commission ("Commission") stay the effectiveness of its recent Truth in Billing Order<sup>1</sup> ("Order") to the extent that it demands compliance by carriers by September 6, 1999.<sup>2</sup> Sprint also requests clarification of the Order's requirement that carriers highlight "new" service providers under rule 64.2001(a)(2), and non-deniable charges under rule 64.2001(c).

Sprint, generally, commends the Commission for its efforts to clarify billing to enable customers to better understand and evaluate their bills. Sprint has, over the past year, conducted significant customer surveys and performed research to devise a new

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<sup>1</sup> *Truth in Billing and Billing Format*, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket 98-170, FCC 99-72 (rel. May 11, 1999) ("Order").

<sup>2</sup> The effective date of the rules has moved from July 26, 1999 to on or after September 6, 1999 (Public Notice DA 99-1423, released July 20, 1999).

local bill to meet just these objectives.<sup>3</sup> This bill is clear, concise, and customer friendly (see attachment A). Sprint's new local bill, scheduled for roll-out in the first quarter of 2000, meets the spirit and, in Sprint's view, all of the requirements of the Commission's Order. Unfortunately, however, the Commission has set a deadline for implementation of the Order's requirements that Sprint is unable to meet.

To date, Sprint has invested hundreds of thousands of dollars and nearly ten thousand programming hours toward developing the new local bill. Sprint projects that a total of 45,000 hours and \$4.5 million dollars will be needed through the first quarter of 2000 to define requirements, code, test, and install the system. This projection assumes that the new bill, as designed, satisfies the requirements of the Commission's order. Should the Commission determine that all new service providers must be highlighted, rather than new primary service providers only, under section 64.2001(a)(2), the costs of implementing the new bill will increase by an estimated minimum of \$500,000 and 5000 programming hours. Adding to this increased cost is the requirement that deniable and non-deniable charges be identified under section 64.2001(c). While Sprint's new bill will be capable of reporting charges as deniable and non-deniable, identifying which charges are to be reported as deniable and non-deniable presents challenges. For example, a database which identifies non-deniable charges by state would need to be developed and

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<sup>3</sup> As part of its research, Sprint local operations convened 26 focus groups (260 customers) in 9 cities to refine its approach to the new bill. It held 31 personal interviews with leaders in 13 states served by Sprint's local division. It also performed secondary research and benchmarking and did internal call center studies to assess billing-related contacts and issues (monitoring and interviews).

linked to billing data. Furthermore, an industry-wide consensus would need to be reached on standard feeds and formats for this information.

Compounding the impossibility of completing the extensive work yet to be done by the Commission's September 6 deadline, is the Y2K transition. Sprint's new bill is a high priority to the company; yet, even it falls subordinate to Y2K readiness. Commencing in early October 1999, Sprint's efforts involving software development and projects such as the new bill will be suspended, ensuring that programming resources will be concentrated on Y2K preparedness and that no changes are made to systems that might interact/interfere with existing Y2K fixes.

Thus, Sprint requires a stay of the Order's compliance deadline until April 1, 2000 to provide a fully compliant, fully tested local bill. If required to highlight new service providers other than primary service providers, Sprint would require an additional three months' minimum extension until July, 2000. If required to track deniable and non-deniable charges, Sprint's implementation timeline would be further extended, depending upon the time required to properly identify non-deniable charges and to develop industry-wide definitions and standards.

## **I. PETITION FOR STAY OR WAIVER**

Sprint requests that the Commission stay the effectiveness of its Order to the extent that it demands compliance by September 6, 1999. The stay is justified in that Sprint will likely prevail on the merits, failure to grant the stay would cause Sprint

serious and irreparable harm, others will not be harmed by a grant of the stay, and it would serve the public interest.

**A. Sprint would likely prevail on the merits**

Sprint would likely prevail on the merits because the Order imposes unreasonable and arbitrary requirements on carriers. The Order unreasonably establishes a compliance deadline without apparent consideration of the complexities, time, and Y2K implications associated with meeting the Order's requirements - a deadline that neither Sprint nor many other carriers subject to the Order can reasonably meet.

As discussed above, although Sprint has already invested 10,000 hours toward developing and implementing its new local bill, it projects an additional 35,000 hours will be required to complete the project.<sup>4</sup> This timeline is extended by the moratorium on software changes and redirection of resources implicated in Y2K preparation. Thus, while Sprint is aggressively pursuing the earliest implementation possible, it simply cannot launch a new compliant billing system by the September 6, 1999 deadline.

Furthermore, it does not appear that the Commission has properly evaluated the effect of certain of its rules (including the identification of "new" service providers and

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<sup>4</sup> To date, Sprint has evaluated and revised over 2,100 core product descriptions on the new bill to ensure clarity. It plans to conduct high-level review of over 6,000 product descriptions to eliminate abbreviations. Sprint also plans to review over 500 adjustment codes, over 12 codes for other charges and credits (all of these charges will be re-mapped to more meaningful section headings). Over 900 print line types on the bill will be analyzed and evaluated (over 500,000 lines of code will be written for the new bill). Modifications will be required to meet specific billing requirements in 18 states served by Sprint local service (27 local companies within Sprint also require special consideration). The messaging approach must be redesigned in order to ensure content is easy to understand and charges are kept together (placement and prioritization of all messages must be determined and new indicators to support message placement will be created).



non-deniable charges, discussed below) in terms of whether they will, in fact, benefit the public. For example, the Commission has not weighed the certain costs of implementing Sections 64.2001(a)(2) or 64.2001(c) against any purported benefits. If long distance carriers are required to track non-deniable charges on every combined bill under 64.2001(c), in addition to the costs of developing a database and of systematically linking that database to billing data, they will surely experience an increase in their bad debt and deterioration in cash flow<sup>5</sup>. While it is possible that some consumers have paid disputed charges under the mistaken belief that failure to do so would result in disconnection of their basic local service, Sprint is unaware of any analysis (by the Commission or any interested party) which attempts to quantify such payments, or the degree to which consumers will withhold payment of disputed non-deniable charges as a result of the Commission's new rule.

The Commission's failure to establish a reasonable timeframe by which carriers are to comply with its new billing rules, in addition to its failure to fully evaluate the burden of those rules on carriers in relation to the benefits, if any, to consumers, are reasonable grounds to expect that Sprint would prevail on the merits.

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<sup>5</sup> See Sprint's Comments filed November 13, 1998, p. 15, describing the increase in uncollectibles and the increase in the number of days customers took to pay their bill Sprint has experienced in states which prohibit termination of local service for non-payment of toll charges. The Commission dismissed this concern, simply stating (Order, para. 48) that carriers may still remind their customers "of their obligation to pay all authorized charges and of the consequences...of a failure to pay any authorized charge."

### **B. Failure to grant a stay would cause Sprint serious and irreparable harm**

If allowed to remain effective, the Order would cause Sprint serious and irreparable harm in that Sprint would be unable to comply with the deadline and would be subject to fines for such noncompliance. Further, in an effort to hasten compliance, Sprint would be forced to redeploy scarce programming staff currently allocated to projects supporting Y2K transition and other revenue-enhancing projects.

Any effort on Sprint's part to pursue the apparent alternative of modifying its existing billing system as an interim "stop-gap" until the new billing system is deployed would be a wasteful expenditure of resources toward a bill that is obsolete and ultimately incapable of meeting the Order's requirements. Thus, this too would cause Sprint to lose unrecoverable time and money in pursuit of compliance with an unrealistic deadline.

### **C. Others will not be harmed by the grant of stay**

Granting the stay will not harm Sprint's competitors or customers; in fact, it will benefit both. Many other carriers have expressed the need for additional time to accommodate the Order's billing requirements<sup>6</sup> and customers will benefit from a bill that is carefully evaluated and tested prior to implementation rather than hastily deployed to meet an arbitrary deadline. Further, with regard to identification of non-deniable charges, consumers continue to be protected by existing state laws and existing carrier

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<sup>6</sup> See e.g., USTA comments at 13, stating: "the FCC should allow carriers to delay implementation of the highlighting and deniable/non-deniable requirements and other major format, software or systems changes until the period in which the Y2K efforts are in the clear, i.e., by April 1, 2000;" US WEST Petition for Relief from Two Truth-in-Billing Mandates Pending Conclusion of Reconsideration Process at 9.

dispute policies. Sprint is unaware of any hard data indicating that any carrier is falsely threatening disconnection of local service for non-payment of non-deniable charges; comments filed by consumer groups or state regulatory entities in this proceeding have expressed a general concern that this might happen, but these parties do not provide evidence that such practice actually occurs.

**D. The stay will serve the public interest**

The stay would serve the public interest in that it would allow enough time for Sprint to fully develop and test its new local bill prior to introduction to the public, thereby facilitating a one-time change that provides customers with complete and accurate descriptions of the new bill and accommodates the clarity and consumer-oriented billing that the FCC intends. Conversely, without a stay, testing might be cut short to accommodate an earlier deadline, increasing the risk of unplanned “glitches” and associated confusion and frustration to the public.

Furthermore, the stay will serve the public interest by enabling Sprint to continue its Y2K readiness work as planned and ensure that the public experiences a transparent and uncompromised Y2K transition.

As an alternative to a stay, Sprint requests that the Commission grant it a waiver of the September 6, 1999 deadline. A waiver is justified because, despite Sprint’s good faith efforts to expeditiously develop a bill that meets the Commission’s requirements, for the reasons described above, Sprint finds it impossible to meet the deadline. As mentioned, the public interest will be served by extending the deadline, whether through

a waiver or stay, in that it will enable Sprint to fully develop and test its bill prior to introduction to the public and will also ensure that Y2K resources are not compromised in an effort to hasten the bill's deployment.

## **II. PETITION FOR PARTIAL CLARIFICATION**

### **A. Clarification of "Highlighting" New Service Providers**

Sprint requests clarification of the requirement that carriers highlight "new service providers" other than new primary carriers. Section 64.2001(a)(2)(ii) of the Commission's rules provides:

[T]he billing entity must provide clear and conspicuous notification of any change in service provider, including notification to the customer that a new provider has begun providing service... "New service provider" is any provider that did not bill for services on the previous billing statement.<sup>7</sup>

Sprint's new bill meets the anti-slamming intent of this requirement by tracking changes to a consumer's primary carrier. Sprint's new bill will also clearly identify all service providers. Sprint does not, however, have the capability to track "new" non-primary service providers. To integrate such tracking capability into our billing system would cost Sprint a great deal of money and months of additional engineering and development work and would significantly delay the roll-out of our new bill<sup>8</sup>. Other

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<sup>7</sup> 47 C.F.R. § 64.2001(a)(2)(ii).

<sup>8</sup> Sprint estimates that to accommodate the Order's requirement that all "new service providers" be identified, Sprint will be forced to expend an absolute minimum of \$500,000.00 and 5000 man hours -- money and time that will not be recouped.

carriers have expressed similar concern over their inability to meet this requirement and the cost and delay of attempting to accommodate it.<sup>9</sup>

Compounding the argument against requiring carriers to identify “new” non-primary service providers is the lack of empirical support that such identification will in any way clarify billing or facilitate identification of cramming incidents. On the contrary, identification of charges as “new” merely by virtue of their not having been billed during the preceding month, including any “new” dial-around provider, “new” operator service provider, “new” directory assistance provider, or “new” pay-per-call service provider, will likely cause INCREASED bill complexity and customer confusion.

Thus, the requirement that carriers highlight new service providers, other than new primary service providers, would cost substantial money, effort, and delay, with little or no corresponding improvement to bill clarity or reduction of cramming incidents. The requirement is not justified and should be eliminated.

**B. Compliance with Section 64.2001(c) can not be achieved by September 6, 1999 and the rule itself must be clarified.**

The pending Section 64.2001(c) of the Rules requires that for bills which include charges for both local and other services, “the carrier” must explain the distinction between deniable and non-deniable charges to the customer, and “must clearly and

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<sup>9</sup> Although the Order acknowledges that “virtually all carriers assert that their current billing systems cannot conduct a month-to-month comparison of all charges as would be necessary to identify and explain all new services being billed for the first time, and the modifications necessary to perform this function would be prohibitively expensive,” it fails to address this limitation and expense, merely offering carriers latitude in their method of “highlighting,” rather than a solution to tracking the provider changes to be

conspicuously identify on the bill those charges for which non-payment will not result in disconnection of basic, local service.”

As an initial matter, it is not clear which “carrier” is responsible for highlighting non-deniable charges on a combined bill. Because the local exchange carrier (LEC) does the billing, and because disconnection of basic local service is at issue, it is not unreasonable to assume the local carrier should be responsible for highlighting non-deniable charges.<sup>10</sup> On the other hand, at least one carrier has assumed that it is the responsibility of the IXC (or other provider of the non-deniable service) to highlight non-deniable charges.<sup>11</sup> Until this basic question of responsibility can be clarified, carriers should not be expected to expend resources to comply with Section 64.2001(c). Whether it is the responsibility of the local exchange carrier or the long distance carrier; however, compliance with Section 64.2001(c) can not be accomplished by the September 6, 1999 deadline.

In order to meet this requirement, Sprint and other carriers would have to develop a database that identifies those states having deniable/non-deniable statutes or requirements, the types of charges each state considers non-deniable, and any special

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highlighted or evaluating whether such highlighting will provide customers with sufficient, if any, improved billing clarity to justify the expense.

<sup>10</sup> USTA, which represents over 1200 local exchange carriers, has requested that Section 64.2001(c) be permanently waived or stayed for its small and mid-sized LEC members because they cannot implement such rule. Furthermore, at least one RBOC has approached Sprint Long Distance to discuss the verbiage to explain the non-deniable charge rule, but has given no indication that it expects Sprint Long Distance to be the party to highlight non-deniable charges.

<sup>11</sup> See US West’s “*Petition for Relief from Two Truth-in-Billing Mandates Pending Conclusion of Reconsideration Process*” filed July 19, 1999, p. 12, n. 25 (“when IXC charges are combined with local

additional requirements that may apply (*e.g.*, whether the policy applies to residential, but not business, customers). Sprint currently does not have in place such a database, nor do we have the resources available to design and build the database, or implement associated systems changes to link that database to billing information, by September 6, 1999. Systems changes must be scheduled several months in advance, and there are numerous projects already in the queue for implementation in the next 3-6 months. Furthermore, as stated earlier, Sprint has declared a moratorium on changes which might interfere with Y2K compliance. Other carriers have reported facing similar resource and Y2K constraints.<sup>12</sup>

Compliance with Section 64.2001(c) is best accomplished on an industry-wide basis. Matters of industry-wide concern such as this are generally referred to an industry forum such as the OBF to ensure that one set of standards is adopted. Absent national standards, a nationwide carrier such as Sprint Long Distance, which has billing and collection agreements with many LECs, could face a situation in which each LEC has different requirements about how non-deniable charges are to be highlighted (assuming, of course, that it is the service provider and not the LEC which is responsible for implementing Section 64.2001(c)). Similarly, local providers would find it unworkable to receive different data feeds/formats from each of the numerous IXC's for which they perform billing and collection functions. It is obvious that accommodating LEC-specific

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exchange billings, the 'covered carrier' (i.e., the IXC) is required to cause a differentiation [between deniable and non-deniable charges] to be made...").

<sup>12</sup> See footnote 6, above.

requirements, or accepting IXC-specific data formats, is far more costly and inefficient than accommodating a single industry-wide standard.

## **CONCLUSION**

The issues described above affect most, if not all, carriers, and the Commission should therefore grant a stay of its Order to the extent that it unreasonably requires carriers to implement its billing requirements before September 6, 1999. In the alternative, it should grant Sprint a waiver of the September 6, 1999 deadline because despite its best good faith efforts, Sprint will be unable to meet that deadline and a waiver will be in the public interest.

The Commission should clarify the rule requiring carriers to highlight new service providers, other than new primary interexchange service providers. To the extent the Commission did intend for LECs to identify all new service providing the Commission should eliminate this requirement as it would be unjustifiably costly to implement—in terms of money, effort, and delay—in relation to its likely value (if any) to customers. The Commission should also clarify which carrier—IXC or LEC—is responsible for highlighting non-deniable charges, and how standard reporting formats are to be developed.



Respectfully submitted,

Sprint Corporation

By: Jay C. Keithley

Jay C. Keithley

Rikke K. Davis

Norina Moy

1850 M. Street, NW, Suite 1100

Washington, DC 20036

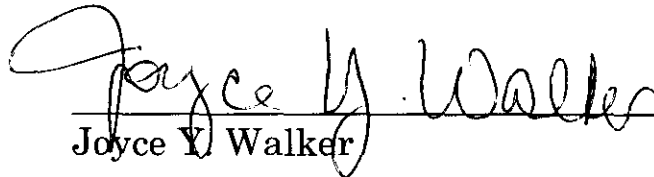
(202) 828-7400

Its Attorneys

July 26, 1999

## CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 26<sup>th</sup> day of July 1999, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Petition for Stay or Waiver and Partial Clarification," In the Matter of Truth-in-Billing and Billing Format, CC Docket No. 98-170, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.

  
Joyce Y. Walker

Larry Strickland  
Common Carrier Bureau  
Portals II  
445-12th Street S.W.,  
Washington, D.C. 20554

ITS  
The Portals  
445 12<sup>th</sup> Street SW Room CY-B400  
Washington, D.C. 20036

David Konuch  
Enforcement Division  
Portals II  
445-12th Street S.W.,  
Washington, D.C. 20554

Anita Cheng  
Common Carrier Bureau  
Portals II  
445-12th Street S.W.,  
Washington, D.C. 20554

Glenn Reynolds  
Common Carrier Bureau  
Portals II  
445-12th Street S.W.,  
Washington, D.C. 20554



Monthly statement: March 11, 1999

Page 1 of 8

Customer service  
1-800-555-1234

Internet address  
www.sprint.com

Customer number  
615-245-1401-100

### Fast Facts

John B Jones  
437 Arbuckle Avenue  
Your Town, USA  
12345-1000

**Date Due:** March 25, 1999

**Total Due:** \$196.40

Your satisfaction is important. Now you can call us toll free with your comments, suggestions or ideas. We are always looking for ways to improve our service to you.

### Customer Summary

Previous charges 88.01  
Payment received February 25 - Thank you! -57.42

Past due balance 30.59

*Any unpaid past due amount must be paid immediately to avoid possible interruption of services*

Current month charges 165.81

**Total amount due: \$196.40**

### Current Month Charges

Sprint local services: see page 3 97.03

Sprint long distance charges: see page 6 52.98

USBI charges: see page 9 15.80

**Total Current Month Charges: \$165.81**

### Carrier Selections

One or more of your carrier selections has been changed since the last billing statement. See page 5 for details.



Please recycle



Please return this portion with payment.

Customer service  
1-800-829-8009

Internet address  
www.sprint.com

Customer number  
615-245-1401-100

Date due: March 25, 1999

Total amount due: \$196.40  
\$200.33 if received March 25th or after.

☐ Check here if information is requested on back.

|||||

AUTO CR \*\*R006

John B Jones  
437 Arbuckle Avenue  
Your Town, USA 12345-1000

Amount enclosed:

Write your 13-digit customer number on your check

Make checks payable to:

Sprint  
Post Office Box 1236  
Lincoln, NE 66203-0010

|||||

12 61524514011009 00000000019640 000050713 06281109

Customer service  
1-800-555-1234Internet address  
www.sprint.comCustomer number  
615-245-1401-100**Important Information****State and federal regulatory news concerning your communication services.**

Federal and state rules require identification of specific charges which may result in interruption of basic local phone service if not paid (+). Optional services and equipment are available to customers as an added value, but are not required to provide your basic phone service. Customers are responsible for the full amount due for any services requested.

**Consumer rights - 900 services**

This notice is to inform consumers of their rights regarding payment for 900 services, as specified by federal regulations. 900 service charges, which are pay-per-call charges, may be billed on your local telephone bill by Sprint or by companies that have a billing agreement with Sprint. Further information about a 900 service charge can be obtained by calling the toll free number of the company associated with these calls. Access to 900 services can be blocked by contacting Sprint's customer service department.

To dispute a 900 service charge appearing in the local telephone bill, you must call the company number provided for billing inquiries listed on the page where the charge appears. You must call the company responsible for the 900 charges directly to register your dispute within 60 days of the monthly statement date. You can provide notification of the billing error over the phone by calling the 800 number of the company providing the 900 service.

Any dispute not resolved over the phone will be investigated, and you will be advised of the outcome within 90 days of your initial notification (written responses provided on request). Payment of 900 service charges under investigation can be withheld pending resolution, and collection activities will not occur during this time. The provider of the service or their agent may further investigate any charges that are removed at the time of your initial contact. If charges are subsequently determined to be valid, the company providing the service and/or agents may use their own collection process to obtain payment for the amount due.

All companies providing 900 services must comply with the dispute process outlined in this notice. Failure to comply with these rules will result in a forfeit of up to \$50 per occurrence of the disputed amount. The Federal Communications Commission classifies 900 services as non-communications services, so non-payment of such charges can not result in discontinuation of your local or long distance services. Failure to pay for legitimate 900 charges, however, can result in terminating access to 900 services.

Customer Number



7 1 7 - 4 8 6 - 4 0 1 6 - 9 4 1

Amount Due



\$ 2 3 6 . 7 7

**An easy way to receive information about Sprint products and services!**

Would you like to know more about how Sprint products, services and technology can make your life easier? Just mark any item which interests you.

To ensure a response, please remember to check the box on the front of this page. For more information call 1-800-555-1234 or visit our web site.

- |   |  |
|---|--|
| <input type="checkbox"/> Sprint local, long distance and feature packages | <input type="checkbox"/> Sprint PCS                      |
| <input type="checkbox"/> Sprint MessageLine voice mail                    | <input type="checkbox"/> Sprint on-line billing          |
| <input type="checkbox"/> Sprint paging                                    | <input type="checkbox"/> Sprint telephones and equipment |
| <input type="checkbox"/> Sprint calling services                          |  |

Customer service  
1-800-555-1234Internet address  
www.sprint.comCustomer number  
615-245-1401-100

Phones for your home or office. Sprint has a variety of feature rich residential and home office telephones. For more information check out our web site at [www.sprint.com](http://www.sprint.com) or call us at 1-800-555-1234

**Sprint Local Services****Summary of Charges: March 11 - April 10**

Adjustments	-4.48
Sprint local services for 615-245-1401	35.64
Sprint local services for 615-245-1402	42.42
Equipment	5.95
Taxes and surcharges	17.50

**Total Sprint local services****\$97.99****Detail of Charges: March 11 - April 10****Adjustment: credits**

Directory assistance, February 26	-.75
Toll adjustment, March 3	-.23
MessageLine discontinued	-5.00
<i>Partial month service February 26 - March 1</i>	

**Adjustment: charges**

Late payment fee †	1.50
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Total adjustments	-\$4.48
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**Sprint Local Services for 615-245-1401**

Residential phone service †	21.02
Call waiting ID service	6.50

**Usage-based services**

Three-way calling (*71)	2 @ .75	1.50
Return call (*69)	3 @ .75	2.25
Local directory assistance	3 @ no charge	0.00
Local directory assistance	5 @ .45	2.25

**Extended local service**

*Extended local service includes calls outside your designated local calling area*

Day: 4 calls	10 minutes	1.20
Evening: 5 calls	4 minutes	.52
Night/weekend: 2 calls	5 minutes	.40

**Sprint local calling card**

Global Access card charges	2.50
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Total local service for 615-245-1401	\$35.64
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**Global Access card itemized calls**

Date	Time	Place called	Number called	Period	Minutes	Amount
1 Mar 9	11:26 P	Engelbrecht, MO from Havelock, NC	252-464-0455 from 615-245-1401	Night	10	2.50

Total Global Access card charges	\$2.50
----------------------------------	--------

Customer service  
1-800-555-1234Internet address  
www.sprint.comCustomer number  
615-245-1401-100**Sprint Local Services for 615-245-1402**

Sprint Solutions 28.95

*Sprint Solutions includes: residential phone service †, call waiting, caller ID, call waiting ID, return call (\*69), anonymous call rejection, call forward busy/no answer, and 60 minutes local toll calling*

**Usage-based services**

Three-way calling (\*71) 3 @ .75 2.25

Local directory assistance 3 @ no charge 0.00

Local directory assistance 5 @ .45 per call 2.25

**Extended local service**

*Extended local service includes calls outside your designated local calling area*

Day: 3 calls 8 minutes .19

Evening: 1 call 2 minutes .40

Night/weekend: 2 calls 13 minutes 1.56

**Local toll calling**

*For more information about your local toll calling area please refer to your phone directory.*

Sprint Solutions plan: 60 minutes included

Additional usage: 64 minutes 24.06

Plan discount: -17.66

Sprint Solutions plan charges 6.40

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Total local service for 615-245-1402 \$42.42**Sprint Solutions itemized calls**

	Date	Time	Place called	Number called	Period	Minutes	Amount
2	Feb 15	10:06 P	Havelock, NC	252-464-0456	Night	14	6.00
3	Feb 28	11:49 P	Havelock, NC	252-464-0456	Night	14	12.00
4	Mar 9	11:04 P	Havelock, NC	252-464-0456	Night	16	6.06

Total Sprint Solutions charges \$24.06\*

\*Reflects charges prior to plan discount - you saved \$17.66 this month

**Equipment**Caller ID display - 1<sup>st</sup> of 6 installments 8.95*Purchased March 2, 1999 for \$53.70**Remaining balance: \$44.75*

10% discount caller ID display -3.00

Total equipment \$5.95

**Taxes and surcharges**

Long distance access surcharge: 2 lines † 9.50

*For an explanation of long distance access surcharge**Please call 1-800-555-1212*

Number portability surcharge 1.57

*For an explanation of number portability surcharge**Please call 1-800-555-1212*

Emergency 911 surcharge †

Telecommunications relay service surcharge † .13

Federal tax 3.00

State tax 2.76

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Total taxes and surcharges \$17.50

Customer service  
1-800-555-1234Internet address  
www.sprint.comCustomer number  
615-245-1401-100**Change in Service**

For your convenience this section of your bill is provided to easily identify any changes to your Sprint local service account since the last billing statement, and to confirm your carrier selections.

**Summary for 615-245-1401**

Services and equipment	Activity	Confirmation
Caller ID	added March 2	S703451
Caller ID Display	added March 2	C711542
MessageLine	discontinued March 15	C711542

**Current carrier selections**

Local toll: Sprint	no change	
Long distance: Sprint	from AT&T March 20	verbal

**Summary for 615-245-1402**

Services and equipment	Activity	Confirmation
900 blocking	added March 10	C711542
Sprint sense local toll	added March 31	C711542

**Current carrier selections**

Local toll: Sprint	no change
Long distance: Frontier	no change

**Customer News****Billing questions?**

To get answers to frequently asked billing questions or make payment arrangements, call 1-800-877-7077. You will be prompted to enter the 13 digit customer number located in the upper right hand corner of your bill. You can call this number any time, day or night to take advantage of Sprint's new automated billing services.



Internet address  
www.sprint.comCustomer number  
615-245-1401-100**Sprint Long Distance 1-800-746-3767**

Sprint Account ID 6184-940-785

Sprint Invoice 11117648

**Summary of charges for 615-245-1401**

Direct dial charges	32.70
International charges	10.68
Other charges and credits	3.65
Taxes	1.65

**Total current charges****\$48.68****Direct dial itemized calls**

	Date	Time	Place called	Number called	Period	Minutes	Amount
5	Mar 23	8:37 P	Daleville, AL	312-467-2000	Evening	5	.50
6	Mar 24	2:23 P	Olathe, KS	732-469-8000	Day	13	1.30
7	Mar 25	5:41 P	Monterey, CA	717-224-0022	Day	3	.30
8	Mar 26	10:15 A	Lindavista, CA	305-492-1234	Day	1	.10
9	Mar 26	11:52 P	Homestead, FL	314-987-5634	Night	2	.20
10	Mar 26	8:00 A	Los Angeles, CA	502-347-1233	Day	1	.10
11	Mar 26	8:00 A	Odenton, MD	502-347-1233	Day	1	.10
12	Mar 26	5:19 P	Lynchburg, VA	404-529-1000	Day	1	.10
13	Mar 26	8:14 P	Harrisonburg, VA	615-245-1402	Evening	28	2.80
14	Mar 26	11:19 A	Lindavista, CA	615-245-1402	Day	1	.10
15	Mar 26	2:10 P	Cincinnati, OH	513-556-7775	Day	7	.70
16	Apr 1	10:15 A	Dir Asst, VA	765-432-1530	Day	1	.10
17	Apr 2	12:10 P	Newpt Nws, VA	875-432-1698	Day	3	.30
18	Apr 2	2:23 P	Newpt Nws, VA	732-469-8000	Day	1	.10
19	Apr 2	5:26 P	Jacksonville, FL	785-989-1234	Day	1	.10
20	Apr 2	2:23 P	Warner Bros, GA	732-469-8000	Day	1	.10
21	Apr 2	5:41 P	Dir Asst, VA	717-224-0022	Day	1	.10
22	Apr 2	10:15 A	Dir Asst, VA	305-492-1234	Day	1	.10
23	Apr 2	11:52 P	Lindavista, CA	314-987-5634	Night	1	.10
24	Apr 2	8:00 A	Da Compl, VA	502-347-1233	Day	1	.10
25	Apr 2	8:00 A	Dir Asst, VA	502-347-1233	Day	1	.10
26	Apr 3	5:19 P	Hampton, VA	404-529-1000	Day	2	.20
27	Apr 3	8:14 P	Hampton, VA	615-245-1402	Evening	1	.10
28	Apr 3	11:19 A	Newpt Nws, VA	615-245-1402	Day	3	.30
29	Apr 3	2:10 P	Newpt Nws, VA	305-330-1287	Day	3	.30
30	Apr 3	10:15 A	Newpt Nws, VA	765-432-1520	Day	2	.20
31	Apr 3	12:10 P	Norfolk, VA	875-432-1098	Day	1	.10
32	Apr 3	2:23 P	Norfolk, VA	732-469-8000	Day	2	.20
33	Apr 3	5:26 P	Fort Lee, VA	785-989-1234	Day	1	.10
34	Apr 3	10:15 A	Petersburg, VA	298-765-4324	Day	1	.10
35	Apr 3	12:10 P	Virginibch, VA	529-875-4347	Day	2	.20
36	Apr 3	2:23 P	Virginibch, VA	732-469-8000	Day	1	.10
37	Apr 3	5:26 P	Hampton, VA	785-989-1234	Day	3	.30
38	Apr 3	11:19 A	Virginibch, VA	615-245-1402	Day	1	.10
39	Apr 4	2:10 P	Lindavista, VA	305-330-1287	Day	22	2.20
40	Apr 4	10:15 A	Cincinnati, OH	513-432-1520	Day	30	3.00
43	Apr 05	05:26 P	Monterey, CA	785-989-1234	Day	1	.10
44	Mar 26	11:19 A	Monterey, CA	615-245-1402	Day	5	.50
45	Mar 26	02:10 P	Monterey, CA	513-556-7775	Day	3	.30
46	Apr 01	10:15 A	Alexandria, VA	765-432-1530	Day	2	.20
47	Apr 02	12:10 P	Alexandria, VA	875-432-1698	Day	1	.10
48	Apr 02	02:23 P	Alexandria, VA	732-469-8000	Day	2	.20

Internet address  
www.sprint.comCustomer number  
615-245-1401-100

## Direct dial itemized calls

	Date	Time	Place called	Number called	Period	Minutes	Amount
49	Apr 2	5:26 P	Alexandria, VA	785-989-1234	Day	2	.20
50	Apr 2	2:23 P	Rilington, TN	732-469-8000	Day	1	.10
51	Apr 2	5:41 P	Monterey, CA	717-224-0022	Day	1	.10
52	Apr 2	10:15 A	Carmel, CA	305-492-1234	Day	1	.10
53	Apr 2	11:52 P	Dir Asst, CA	314-987-5634	Night	1	.10
54	Apr 2	8:00 A	Carmel, CA	502-347-1233	Day	1	.10
55	Apr 2	8:00 A	Carmel, CA	502-347-1233	Day	2	.20
56	Apr 3	5:19 P	Monterey, CA	404-529-1000	Day	8	.80
57	Apr 3	8:14 P	Wilmington, TN	615-245-1402	Evening	1	.10
58	Apr 3	11:19 A	Wilmington, TN	615-245-1402	Day	1	.10
59	Apr 3	2:10 P	Wilmington, TN	305-330-1287	Day	2	.20
60	Apr 3	10:15 A	Wilmington, TN	765-432-1520	Day	1	.10
61	Apr 3	12:10 P	Wilmington, TN	875-432-1098	Day	6	.60
62	Apr 3	2:23 P	Lindavista, CA	732-469-8000	Day	1	.10
63	Apr 3	5:26 P	Virginibch, VA	785-989-1234	Day	5	.50
64	Apr 3	10:15 A	Cincinnati, OH	298-765-4324	Day	3	.30
65	Apr 3	12:10 P	Raliegh, NC	529-875-4347	Day	2	.20
66	Apr 3	2:23 P	Lindavista, CA	732-469-8000	Day	21	2.10
67	Apr 3	5:26 P	Lindavista, CA	785-989-1234	Day	1	.10
68	Apr 3	11:19 A	Apex, NC	615-245-1402	Day	1	.10
69	Apr 4	2:10 P	Cincinnati, OH	513-432-1520	Day	14	1.40
70	Apr 4	10:15 A	Cincinnati, OH	513-432-1520	Day	3	.30
71	Apr 5	12:10 P	Lindavista, CA	875-432-1098	Day	1	.10
72	Apr 5	2:23 P	Raliegh, NC	732-469-8000	Day	1	.10
73	Apr 5	5:26 P	Dir Asst, CA	785-989-1234	Day	1	.10
74	Apr 3	10:15 A	Carmel, CA	298-765-4324	Day	2	.20
75	Apr 3	12:10 P	Carmel, CA	529-875-4347	Day	1	.10
76	Apr 3	2:23 P	Dir Asst, CA	732-469-8000	Day	1	.10
77	Apr 3	5:26 P	Dir Asst, CA	785-989-1234	Day	1	.10
78	Apr 3	11:19 A	Sacramento, CA	615-245-1402	Day	4	.40
79	Apr 4	2:10 P	Carmel, CA	305-330-1287	Day	4	.40
80	Apr 4	10:15 A	Lindavista, CA	513-432-1520	Day	2	.20
81	Apr 5	12:10 P	Monterey, CA	875-432-1098	Day	2	.20
82	Apr 5	2:23 P	Raliegh, NC	732-469-8000	Day	1	.10
83	Apr 5	5:26 P	Raliegh, NC	785-989-1234	Day	1	.10

Total direct dial charges

\$37.20

## International itemized calls

84	Mar 27	08:37 P	Spain	34-649-023-503-0000	Evening	1	1.31
85	Mar 29	02:23 P	Spain	34-649-023-503-0000	Day	7	9.17

Total international charges

\$10.48

## Other charges and credits

Federal universal service charge	2.80
Presubscribed line charge	.85
Service charge	4.95
Monthly fee waiver	-4.95
Total other charges and credits	\$3.65

## Taxes

Federal tax	1.46
Local tax	.19
Total taxes	\$1.65

Customer number  
615-245-1401-100

For USBI billing inquiries, please call 1-800-479-8724

This portion of your bill is provided as a service to USBI. There is no connection between Sprint and USBI. Please review all charges appearing in this section. Any questions regarding your USBI charges should be referred to the number listed on this page. As a service to our customers, Sprint prints billing information and collects payment for USBI.

USBI is a clearinghouse that bills for long distance carriers. USBI's customer service center is open from 8 am to 6 pm central time Monday through Friday. Please call us at 888-456-7890.

**Summary of USBI charges****Adjustments**

Frontier Communication Services March 9, 1999	-2.15
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**Charges billed on behalf of Frontier Communication****Long distance services**

Direct dial charges	615-245-1402	1.44
Calling card charges	615-245-1402	6.53
International charges	615-245-1402	1.10

**Other charges and credits**

Monthly fee	March 1	5.00
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**Taxes**

Federal tax	2.85
State tax	1.06

<b>Total USBI charges</b>	<b>15.80</b>
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**Direct dial itemized calls**

	Date	Time	Place called	Number called	Period	Minutes	Amount
86	Mar 4	5:26 P	Chapman, KS	785-989-1234	Day	1	-.50
87	Mar 5	10:15 A	Miami, FL	305-492-1234	Day	3	.30
88	Mar 6	11:52 P	St. Louis, MO	314-987-5634	Night	2	1.54
89	Mar 7	8:00 A	Ghent, KY	502-347-1233	Day	1	-.10
90	Mar 8	8:00 A	Ghent, KY	502-347-1233	Day	1	-.10
91	Mar 9	5:19 P	Atlanta, GA	404-529-8000	Day	1	-.10
<b>Total direct dial charges</b>							<b>\$1.44</b>

**Calling card itemized calls**

92	Mar 7	8:14 P	Miami, FL	615-245-1402	Evening	1	.33
93	Mar 10	11:19 A	Atlanta, GA	615-245-1402	Day	6	6.45
94	Mar 12	2:10 P	Miami, FL	305-330-1287	Day		.25
<b>Total calling card charges</b>							

**International itemized**

95	Mar 13	10:15 A	London	59-298-765-432-1000	Day	2	2.10
96	Mar 14	12:10 P	Germany	88-529-875-432-1000	Day	1	1.00
<b>Total international charges</b>							<b>\$1.10</b>